

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEBBIE ANN BROMFIELD-THOMPSON,

Plaintiff,

v.

AMERICAN UNIVERSITY OF
ANTIGUA/MANIPAL EDUCATION
AMERICAS, LLC A/K/A GCLR, LLC, AND
NBME,

Defendants.

Civil Case No.: 19-CV-6078

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT, upon the accompanying (a) Memorandum of Law in Support of the Joint Motion to Dismiss of Defendants American University of Antigua (“AUA”) and Manipal Education Americas, LLC (“MEA”); (b) the Declaration of Vernon Solomon; (c) the Declaration of Leonard A. Sclafani; and (d) the Declaration of Amina Hassan, with accompanying exhibits, and all the prior pleadings and proceedings in this action, defendants AUA and MEA will move this Court, pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(5), and 12(b)(6), before the Honorable Jesse M. Furman at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order granting AUA’s and MEA’s Motion to Dismiss, and dismissing Plaintiff’s Complaint in this action (ECF 1) in its entirety as to defendants AUA and MEA, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court’s November 26, 2019 Order (ECF 33), Plaintiff shall file by January 13, 2020, either (1) an amended complaint pleading any additional facts that Plaintiff believes will cure deficiencies

identified in AUA's and MEA's instant motion to dismiss as well as the motion to dismiss filed by defendant National Board of Medical Examiners ("NBME") or (2) a consolidated opposition brief responding to both the pending motions to dismiss;

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court's November 26, 2019 Order (ECF 33), in the event that Plaintiff files a consolidated opposition brief, AUA's and MEA's replies will be due by January 20, 2020.

Dated: New York, New York
December 9, 2019

Respectfully submitted,

HUGHES HUBBARD & REED LLP

By: /s/ Robb W. Patryk

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Americas, LLC and American University of Antigua